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July 14, 2021

VIA ECF

Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gerald v. D.C.V. Holdings, Inc. et al.
Case No. 17-cv-06525

Dear Judge Mann:

This firm represents Plaintiff in the above-referenced matter. We write, with the consent of Defendants' counsel, in response to the Court's order of July 13, 2021, setting deadlines for expert discovery. We respectfully request an extension of these dates due to extenuating circumstances of which we have informed Defendants' counsel.

Plaintiff's wife is currently hospitalized in North Carolina in the Intensive Care Unit in critical condition. She has been hospitalized for three weeks at the current time. Mr. Gerald has been at the hospital all day every day since the inception of the hospitalization. We only learned of this when we contacted Plaintiff several days ago regarding the summary judgment decision and to discuss expert matters with our client.

Plaintiff respectfully requests that the Court adopt the parties' previously submitted proposed expert discovery schedule (ECF Doc. No. 76), given these circumstances, which is why the parties had proposed that Plaintiff would have until October 15, 2021, to complete expert discovery disclosure so that Plaintiff can participate in same and attend necessary meetings.

We thank you for your time and consideration of this matter.

Respectfully submitted,

GODDARD LAW PLLC

By: /s/ Kelly A. Magnuson
Kelly A. Magnuson, Esq.

cc: All Counsel of Record Via ECF